UNDERGROUND
ENGINEERING &
ENVIRONMENTAL
SOLUTIONS

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HALEY & ALDRICH

03 March 1999
File No. 74167-001

New Jersey Department of Environmental Protection
Bureau of Environmental Evaluation and Cleanup Responsibility Assessment
P.O. Box 432
401 East State Street
Trenton, NJ 08625

Attention: Joseph J. Nowak

Subject: Response to NJDEP 3 February 1999 Letter
Hexcel Corporation
Lodi Borough, Bergen County, New Jersey
ISRA Case No. 86009

Dear Mr. Nowak:

On behalf of Hexcel Corporation (Hexcel), this letter is in response to the New Jersey Department of Environmental Protection (NJDEP) letter of 3 February 1999. As we discussed in our telephone conversation on 22 February 1999, Hexcel is on-track with the development of a comprehensive remediation plan for the site and is preparing to present the conceptual plan in a meeting with the NJDEP. For the past few months, the focus had been on the demolition activities that have now been completed. We are currently attempting to arrange a meeting with you and your staff to discuss the conceptual remedial plan. As we discussed yesterday, in order to accommodate everyone's schedule, you advised that Mary Jo Murray of your office would contact me shortly with available dates in mid April. This letter summarizes and discusses the several outstanding issues raised in the most recent and previous letters from the NJDEP.

I. SOIL ISSUES

In the recent letters, NJDEP has advised that Hexcel should move forward with the remediation of contaminated soils while developing the strategy for groundwater remediation. As we discussed with you, the current remedial technologies being considered for the site will remediate both soil and groundwater simultaneously. The remediation of soil without implementing a groundwater remediation plan concurrently will be ineffective due to the nature of contamination at the site, which is related mainly to the presence of dense-non-aqueous phase liquids (DNAPL). Therefore, technologies capable of remediating both contaminated soil and groundwater will be more appropriate and are being considered in development of the comprehensive plan for the site.

II. GROUNDWATER ISSUES

As we discussed, Hexcel is developing a comprehensive remedial strategy for the site and will present the conceptual plan in our scheduled meeting with the NJDEP prior to preparation of a written Remedial Action Workplan Addendum (RAWA). Below we summarize and discuss additional groundwater-related issues.

1. Extent of Silt Layer in the Area of Building 2 and Investigation for Presence of DNAPL

Hexcel proposes to install a boring in the former Building 2 area to define the extent of the confining layer and investigate the presence of DNAPL in this area. The boring location is shown in Figure 1. If the confining layer exists, the boring will be terminated at the top of the confining layer. Continuous sampling will be performed for visual inspection and field screening. The boring will be completed as a shallow monitoring well only if DNAPL is observed in the soil core samples. If the confining layer is absent in this area, this would imply that the construction fill for the subsurface structure extends through the confining layer. Although this scenario is unlikely, the boring location will then be completed as a "deep" monitoring well in this case. The monitoring well will be completed with the top of the screen set at about 3.0 NGVD elevation, which is comparable to the top of the screen elevation for the nearest deep monitoring well MW-7. Hexcel will perform the activities following NJDEP's approval of the proposal.

2. Installation of Bedrock Well near MW-1

The NJDEP has required installation of a bedrock well in the vicinity of MW-1, since this well is screened just above bedrock and contains elevated concentrations of chlorinated compounds. Hexcel acknowledges the NJDEP's requirement for vertical delineation in this area and will install a bedrock well near MW-1.

The schedule for bedrock well installation will be dependent on the schedule for implementation of remediation in this area. Hexcel is concerned about opening a pathway for deeper contamination. In spite of taking appropriate measures to avoid cross-contamination of the formations, the risk is a valid concern because of the thinning of the confining layer in this area. Therefore, Hexcel proposes the installation of the bedrock well for vertical delineation following remediation of the shallow contamination in this area.

3. Delineation of Groundwater Contamination to the South (across Molnar Road)

The evaluation of groundwater testing conducted in July 1998 indicates that additional testing to the south is unwarranted at this time. Monitoring wells MW-22, MW-23, and MW-24 were sampled for Volatile Organics (VOs) and PCBs. Hexcel was denied access

by Napp Technologies, Inc. (Napp) to sample MW-25 (Hexcel well) and MW-E8 (Napp well) on their property.

Groundwater results indicate a significant improvement in concentrations detected in monitoring wells MW-22, MW-23, and MW-24. Specifically, total targeted VO concentrations were decreased from 450 parts per million (ppm) in 1993 to about 1 ppm in 1998. Similarly, total VOs in MW-23 were detected at less than 0.1 ppm compared to 24 ppm in 1995. Additionally, the only compound detected in MW-24 was Chlorobenzene at concentrations below the Ground Water Quality Standards. Although MW-E8 could not be sampled in July 1998, groundwater testing results from January 1997 indicate total VO concentration of about 0.02 ppm. The groundwater testing results and comparison with the historical data was provided to the NJDEP in the October 1998 progress report. Based on the testing results, Hexcel believes that groundwater contamination to the south along Molnar Road has been adequately delineated with regard to the contaminants at Hexcel.

4. **Exclusion of Control Wells (CW-Series) and Recovery Wells (RW-Series) from the Monitoring Program**

NJDEP has required clarification of why CW-series and RW-series wells were not included in the groundwater sampling conducted in July 1998. Hexcel believes that the monitoring wells (MW-Series) provide an adequate network for monitoring the groundwater quality at the site. A total of 24 shallow wells and 9 deep well have been installed for the purpose of monitoring groundwater quality in an approximately one acre sized area . These number of wells are more than adequate for monitoring purposes for the area of the Hexcel site requiring monitoring.

The CW-series and the RW-series wells were installed in 1990 and 1991 in conjunction with the remedial strategy for the site at that time. There was no requirement from the NJDEP for testing these wells when these were installed; in fact, some of the CW and the RW-series wells have never been sampled. This does not mean that the groundwater quality at the site has not been adequately characterized. These wells were not required nor are they necessary for delineation of groundwater contamination.

There are more than 70 wells on-site. Hexcel believes that sampling and testing of all the wells is an unreasonable requirement, especially when such a testing is not expected to add significantly to the understanding of the groundwater conditions in an approximately one-acre size area. If there is a particular CW or RW series well that the NJDEP believes would be valuable for delineation or remediation; Hexcel will acknowledge and consider such a request.

5. Groundwater Testing for Base/Neutral and Acid Extractable Organics and Metals

The NJDEP has advised Hexcel that based on its review of the July 1997 Summary of Historical Groundwater Data Report, groundwater sampling and testing will likely be required for base/neutral and acid extractable compounds (BNAs) and priority pollutant metals (PPMs) due to exceedances in groundwater above applicable surface water quality criteria (SWQC). Below we discuss some of the issues raised by the NJDEP and present a proposal for additional groundwater sampling.

Adequate testing of monitor wells was performed adjacent to the Saddle River. The NJDEP has said that although BNAs were not detected above the SWQC in the wells located immediately adjacent to the Saddle River, not all of the wells next to the Saddle River have been sampled. The fact is that all the monitoring wells adjacent to the Saddle River (MW-10, MW-11, MW-8, MW-9, MW-28, MW-14 and MW-15) have been tested for BNAs and PPMs.

The NJDEP has contended that while Hexcel has claimed that much of the metals contamination detected in groundwater was related to turbidity, the extent to which this is true has never been clearly demonstrated. Hexcel's evaluation of the metals concentrations versus turbidity was based on samples from two monitoring wells (MW-2 and MW-16) which had indicated a significant difference in metals concentrations in filtered versus unfiltered samples. These results were provided in the July 1997 Summary of Historical Groundwater Data Report. Hexcel proposes to perform groundwater sampling for metals as well as BNA testing, as outlined below.

Hexcel proposes to perform groundwater sampling for all the shallow monitoring wells adjacent to the Saddle River (MW-8, MW-10, MW-14, and MW-28) and two control wells (CW-11 and CW-12) to evaluate the potential impact of BNAs and PPMs to the surface water. The samples will be collected using the low-flow purge method to discount the effect of turbidity on metals concentrations. Additionally both filtered and unfiltered samples will be collected for metals analysis to further evaluate the relationship between turbidity and metals concentrations. This additional groundwater sampling will be performed upon the NJDEP's approval of the proposal.

III. ADDITIONAL ISSUES

1. Surface Water Sampling

The NJDEP has required surface water samples at seven locations based on sample spacing of approximately one sample every 60 feet approved for Napp. Based on results of the stream boring investigation, provided to the NJDEP in the January 1999 progress report, the above-referenced spacing is unnecessary for the Hexcel site. Hexcel proposes to collect a total of five surface water samples (3 at approximately 100 foot spacing in the

vicinity of MW-8 and one upgradient and one downgradient) to evaluate the impact to surface water (refer to Figure 1 for proposed sample locations). This sampling frequency is more than adequate to meet the objectives of testing discharge to the River and evaluating the impact to the surface water. The need to include BNA and metals testing for surface water samples will be evaluated based on the results of the groundwater testing proposed in Section II.5 above. Therefore, surface water sampling will be performed upon NJDEP's approval of the proposed sample locations and additional groundwater testing proposal, and evaluation of the groundwater testing results.

2. Baseline Ecological Evaluation

Hexcel will conduct a baseline ecological evaluation pursuant to the Technical Requirements for Site Remediation. The baseline ecological evaluation will be performed following the evaluation of the surface water sampling results.

3. Stream Sediments

As reported to you in our 30 June 1998 letter, Hexcel will prepare a proposal to trace the source of the storm sewer outfall that is approximately 600 to 650 feet downstream of the Hexcel site. Hexcel will also prepare a proposal for further investigation and delineation of the stream sediments in the vicinity of the outfall. The proposals will be included in Hexcel's comprehensive remedial plan.

Please call us if you have any questions regarding the above.

Sincerely yours,
HALEY & ALDRICH, INC.

Sunila Gupta
Project Engineer

Joseph G. Savarese
Project Manager

Enclosures

c: A. William Nosil
Edward Hogan, Esq.

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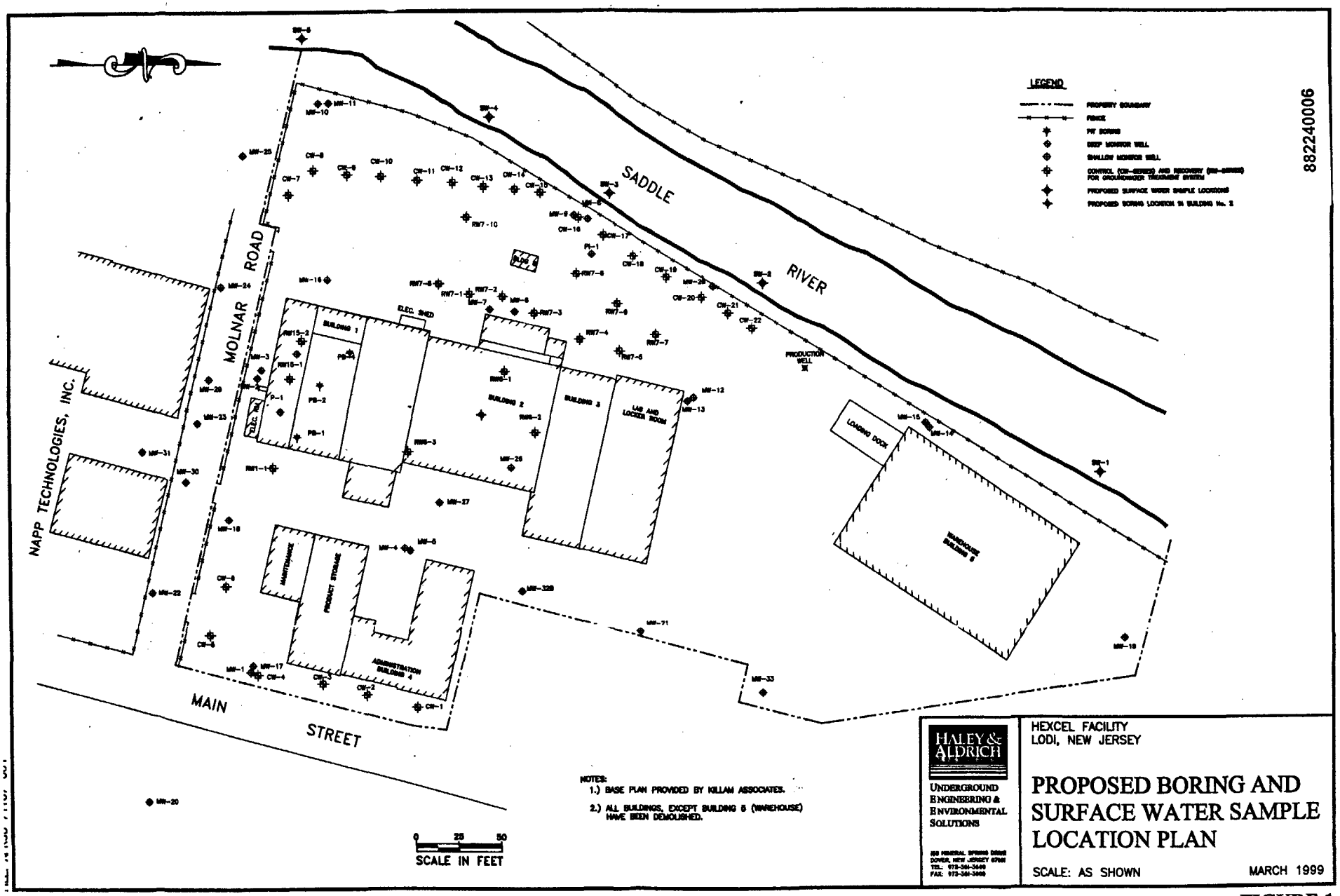
LEGEND
PROPERTY BOUNDARY
FENCE
PW BORING
DEEP MONITOR WELL
SHALLOW MONITOR WELL
PROPOSED SURFACE WATER SAMPLE LOCATIONS
PROPOSED BORING LOCATION IN BUILDING No. 5
882240006
SADDLE
RIVER
MOLNAR ROAD
NAPP TECHNOLOGIES, INC.
MAIN
STREET
BUILDING 1
BUILDING 2
BUILDING 3
LAB AND LOCKER ROOM
ELEC. SHED
PUMP HOUSE
PRODUCTION WELL
LOADING DOCK
WAREHOUSE BUILDING 5
MAINTENANCE
PRODUCT STORAGE
ADMINISTRATION BUILDING 4
0 25 50
SCALE IN FEET
NOTES:
1.) BASE PLAN PROVIDED BY KILLAM ASSOCIATES.
2.) ALL BUILDINGS, EXCEPT BUILDING 5 (WAREHOUSE) HAVE BEEN DEMOLISHED.
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LODI, NEW JERSEY
PROPOSED BORING AND SURFACE WATER SAMPLE LOCATION PLAN
SCALE: AS SHOWN
MARCH 1999

FIGURE 1